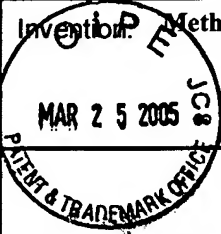




<b>AMENDMENT TRANSMITTAL LETTER (Large Entity)</b>				Docket No. <b>C-3053</b>	
Applicant(s): <b>Richard D. Breault and Patrick L. Hagans</b>					
Application No. <b>10/656,529</b>	Filing Date <b>9/5/2003</b>	Examiner <b>Carol Chaney</b>	Customer No.	Group Art Unit <b>1745</b>	Confirmation No.
Invention: <b>Method of Operating a Fuel Cell System Under Freezing Conditions</b>					
 <b>COMMISSIONER FOR PATENTS:</b>					
Transmitted herewith is an amendment in the above-identified application.					
The fee has been calculated and is transmitted as shown below.					
<b>CLAIMS AS AMENDED</b>					
	CLAIMS REMAINING AFTER AMENDMENT	HIGHEST # PREV. PAID FOR	NUMBER EXTRA CLAIMS PRESENT	RATE	ADDITIONAL FEE
TOTAL CLAIMS	9 -	20 =	0	x \$50.00	\$0.00
INDEP. CLAIMS	2 -	3 =	0	x \$200.00	\$0.00
Multiple Dependent Claims (check if applicable) <input type="checkbox"/>					\$0.00
<b>TOTAL ADDITIONAL FEE FOR THIS AMENDMENT</b>					<b>\$0.00</b>
<input checked="" type="checkbox"/> No additional fee is required for amendment. <input type="checkbox"/> Please charge Deposit Account No. _____ in the amount of _____ <input type="checkbox"/> A check in the amount of _____ to cover the filing fee is enclosed. <input checked="" type="checkbox"/> The Director is hereby authorized to charge payment of the following fees associated with this communication or credit any overpayment to Deposit Account <b>50-1307</b> <input checked="" type="checkbox"/> Any additional filing fees required under 37 C.F.R. 1.16. <input type="checkbox"/> Any patent application processing fees under 37 CFR 1.17. <input type="checkbox"/> Payment by credit card. Form PTO-2038.					
<b>WARNING: Information on this form may become public. Credit card information should not be included on this form. Provide credit card information and authorization on PTO-2038.</b>					
 <b>Stephen E. Revis</b> <b>Registration #26,609</b>			<b>Dated: March 23, 2005</b>		
cc:			I hereby certify that this correspondence is being deposited with the United States Postal Service with sufficient postage as first class mail in an envelope addressed to "Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450" [37 CFR 1.8(a)] on <b>March 23, 2005</b> (Date)  Signature of Person Mailing Correspondence <b>Stephen E. Revis</b> Typed or Printed Name of Person Mailing Correspondence		



IFW

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re application of Richard D. Breault and  
Patrick L. Hagans

Docket No.: C-3053

Examiner: Carol Chaney

Serial No.: 10/656,529

Group Art Unit: 1745

Filed: September 5, 2003

Title: Method of Operating a Fuel Cell System Under Freezing Conditions

Commissioner for Patents  
P. O. Box 1450  
Alexandria, VA 22313-1450

Sir:

**AMENDMENT**

In response to the Office Action dated January 7, 2005, please amend the  
above-identified application as follows:

**IN THE CLAIMS:**

Cancel claims 1-21.

Add the following new claims:

22. A method for operating a fuel cell system, the system including a stack of  
PEM fuel cells including at least one cooler for carrying antifreeze through the  
stack to remove heat, the fuel cell system further including a water circulation  
system for accumulating water and circulating that water through water flow  
passages passing through each cell, wherein, at the time of start-up, the stack  
has frozen water therein and there is insufficient liquid water within the water  
circulation system to enable the circulation of water, the method for operating  
the fuel cell system including (a) starting up and operating the frozen stack by  
introducing non-humidified reactants into the cells and connecting a load  
across the stack to generate heat to increase the stack temperature to above 0°C  
and thereby melt frozen water within the stack, including accumulating liquid  
water during stack operation until there is sufficient liquid water to enable  
circulation of liquid water through the cell water flow passages, and thereafter